


**MEMO ENDORSED****WHITE & CASE**

Plaintiff's motion to seal the  
Memorandum of Law and Exhibit  
A is granted. SO ORDERED.



Edgardo Ramos, U.S.D.J

Dated: May 5, 2022

New York, New York

May 4, 2022

VIA ECF

The Honorable Edgardo Ramos  
Thurgood Marshall United States District Courthouse  
Southern District of New York  
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New York, New York 10007

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Re: *Deutsche Bank Securities Inc. v. Kingate Global Fund Ltd. et al.*, No. 1:19-cv-10823

Dear Judge Ramos:

Pursuant to Rule 5.2 of the Federal Rules of Civil Procedure, Paragraph 3.ii of Your Honor's Individual Practices, and Paragraph 12 of the Stipulation and Confidentiality Agreement and Protective Order (ECF No. 48) (the "Protective Order"), Plaintiff Deutsche Bank Securities Inc. ("DBSI") respectfully submits this letter-motion seeking an Order sealing (1) DBSI's Memorandum of Law in opposition to Defendants Kingate Global Fund Ltd.'s and Kingate Euro Fund Ltd.'s ("Kingate") motion to compel production of documents withheld under the common interest doctrine (the "Memorandum of Law"), and (2) Exhibit A to the Declaration of Andrew W. Hammond ("Exhibit A").

Paragraph 12 of the Protective Order requires that when filing materials designated as "Confidential" or "Highly Confidential" under the Protective Order, or when filing portions of motions that disclose such designated materials, the parties shall seek approval from the Court via a letter motion "filed electronically through the court's ECF system in conformity with the court's standing order, 19-mc-00583, and ECF Rules & Instructions, section 6."

The Memorandum of Law and Exhibit A quote from and cite to documents that have been designated as "Confidential" or "Highly Confidential" under the Protective Order by DBSI and a third-party participant, which this Court has already permitted Kingate and DBSI to file under seal. See ECF Nos. 110, 119. In compliance with Paragraph 12 of the Protective Order, DBSI seeks the Court's permission to file its Memorandum of Law and Exhibit A under seal, while publicly filing the redacted versions of both documents.

To comply with the Protective Order, DBSI respectfully requests that this letter motion be granted in its entirety and an Order be issued sealing (1) the Memorandum of Law, and (2) Exhibit A.

Respectfully submitted,

/s/ Andrew Hammond  
Andrew Hammond

*Counsel for Deutsche Bank Securities Inc.*

Hon. Edgardo Ramos  
May 4, 2022

cc: All Counsel of Record (via ECF)